

HIRSCHORN DECLARATION

EXHIBIT 2

From: Deborah Miller [<mailto:deborah.miller@oracle.com>]
Sent: Tuesday, January 10, 2017 4:31 PM
To: Hirschorn, Deborah
Cc: Brew, Damian; Bruce Cochran (bruce.cochran@oracle.com); Peggy Bruggman
Subject: Oracle claim re Cover Oregon litigation

Hello Deborah, and happy new year. As I think you know, Beazley will be paying its limits on the Cover Oregon claim. Oracle has additional defense costs in excess of our self-insured retention and the amount of Beazley's policy, plus the sums we paid in settlement. I would therefore like to begin our discussions with AIG about reimbursement of these costs and to send you the attorneys' bills in the matter. Is there a form of non-disclosure agreement that AIG prefers to use in this situation? If not, I am happy to revise the agreement we signed with Beazley to apply to AIG. Kindly let me know how you would like to proceed. Thank you.

--

ORACLE

Deborah Miller | Vice President, Associate General Counsel
Phone: [+16505060563](tel:+16505060563)
Oracle Legal Department
500 Oracle Parkway | Redwood Shores, CA 94065



Oracle is committed to developing practices and products that help protect the environment